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October 21, 2002

Mr. Kenneth Weinstein  
National Highway Traffic Safety Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

Re: Early Warning Reporting – Information Technology Issues; Docket No. NHTSA No. 2001-8677

Dear Mr. Weinstein:

On behalf of the tire manufacturer members of RMA, thank you for the opportunity to participate in the public meeting held by the agency on September 24, 2002 in connection with the above-captioned matter. Since this meeting, RMA has continued to evaluate the data integrity, transmission, and other information technology ("IT") issues presented by the early warning reporting requirements. Below, we expand on five major issues of concern to RMA's members:

- (1) the format of the reporting data submission template;
- (2) the need for the development and publication of an "IT Specification" to ensure that data is reported in a standardized format to the Artemis database;
- (3) the reporting format for common green tires;
- (4) the lack of accurate data for reporting property damage claims unless the tire is received by the manufacturer; and
- (5) the need for compliance with the Paperwork Reduction Act and DOT and OMB Data Quality Guidelines

### **(1) Reporting Data Submission Template**

RMA has identified several formatting and other technical issues that could compromise the quality of the data submitted to NHTSA or lead to inconsistencies in reporting by tire manufacturers. To rectify these problems, RMA has slightly modified the early warning reporting templates for tire-related data, principally by inserting three additional tabs to the Excel tire data submission template. The initial format does not accurately reflect some of the data relationships within the tire industry. For example, individual companies may have multiple type codes for a given SKU or conversely multiple SKUs for a given tire type code. Similarly, there exist multiple OE vehicle applications for a given SKU and or type code. RMA has added component condition 99 (unknown) to the property damage claim report tab. See Attachment A.

RMA believes that these formatting improvements will assist the agency in the development and implementation of the Artemis database and provide for the timely and accurate evaluation of tire industry early warning data.

## **(2) Need For An Artemis “IT Specification” And Other IT Issues**

RMA believes a published IT specification addressing documented procedures for the submission of reports, field lengths, data types, valid field values and ranges, similar to the file naming specification published on the NHTSA website, is essential to ensure consistency in the formatting and reporting of early warning data to the Artemis database. RMA urges the agency and Volpe to begin this process as soon as possible, recognizing that such a specification will necessarily be a work in progress as the Artemis system is developed and tested. As a first step in the development of this specification, RMA urges NHTSA and Volpe to provide written responses to the issues listed below. These questions were submitted to the agency in writing on September 18 and orally at the September 24, 2002 public meeting.

- RMA needs a definition for each field on each spreadsheet. This should include the valid list of values or ranges of values where appropriate, e.g., OE vehicle make and model.
- RMA has previously stated a preference for submissions in an XML format. NHTSA has stated that submissions will all be in an Excel format. XML is still the preferred format for all but one of RMA members. Enclosed in Attachment A is the templates in XML format.
- In reporting deaths and injuries the agency has requested component codes that do not correspond to the component codes that tire manufacturers will be using in other reporting. RMA believes these codes should be identical to the condition codes as specified for property damage. (In Appendix A we have changed these component codes to be consistent for tires.)
- In the data specification section, RMA seeks clarification of the requirement to provide unknown numeric information as “unknown” (UNK). This appears to be a contradiction as “UNK” is alphabetic data in a numeric only field.

## **(3) Common Green Tires**

The report tab for common green tires, within the tire submission template, currently includes fields for plant name, brand name, and brand owner. The RMA recommends that these fields be removed from the template. The plant identification data is included on the production, property damage, and warranty adjustments tabs. The brand name and brand name owner should be removed per the RMA Petition for Reconsideration.

## **(4) Property Damage Claims**

Throughout the early warning reporting rulemaking, RMA stressed the importance of allowing tire manufacturers to visually inspect the tire involved in an alleged property damage claim in order to provide the agency with accurate information about the condition of the tire and other information necessary to perform a meaningful analysis of the data. The final rule, however, provides that, “the existence of a claim may not be conditioned on the receipt of anything beyond

the document(s) stating the claim.” 49 C.F.R. §579.4( c). Thus, the final rule currently requires the reporting of a property damage claim whether or not the tire manufacturer has received the tire, ascertained its tire identification number (“TIN”), and assigned the appropriate damage claim condition codes.

As you know, RMA has petitioned NHTSA for reconsideration of this issue for two primary reasons (Docket No. NHTSA-8677-506). The first reason is relative to alleged versus verified conditions. Previously RMA reported that, based on a sampling of data by six of the RMA members, approximately 20% of property damage claims received by the manufacturer have consumer-alleged conditions associated with the claim. For this reason the RMA is recommending that only verified conditions be reported to NHTSA. Should the alleged condition be required by NHTSA, approximately 80% of the data will be reported as condition unknown.

The second reason is relative to the definition of minimal specificity. Current minimal specificity for property damage claims is “manufacturer, tire model and tire size”. This definition for minimal specificity, however, is overly broad because it is inclusive of multiple SKUs, multiple type codes and multiple load ranges. Unless the TIN number is provided to the manufacturer or the manufacturer has the opportunity to examine the tire to obtain the TIN number, the detail required in the Excel template format is not available, namely the SKU, type code, load range, plant of manufacture and date of manufacture. Such data would therefore be reported as an aggregate of multiple SKU’s, tire designs, load ranges, manufacturing locations, and manufacturing dates. However, the data would also be reported as “unknown” on the reporting templates rendering the data of little value for purposes of Early Warning. Therefore, property damage claims received by the manufacturer and containing minimal specificity would have to be aggregated and could not be reported by SKU (or tire model or tire size) as anticipated by the reporting format.

Receipt of property damage claim tires by the manufacturers, prior to reporting, would not unduly delay early warning recognition of potential tire defects. In most cases, manufacturers receive property damage claim tires within two weeks of the initiation of the claim. If the minimal specificity for property damage claims included the TIN, few tires would be excluded from a given quarterly report and reporting could be done aggregately and more accurately by SKU, manufacturing plant, and production date.

#### **(5) Need for Compliance with the Paperwork Reduction Act and DOT and OMB Data Quality Guidelines**

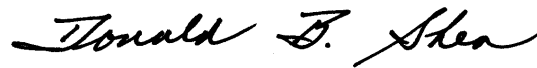
Collection and use of Early Warning Reporting information will need to comply with the Paperwork Reduction Act as well as DOT’s and OMB’s Data Quality guidelines. OMB has stated that Information Collection Requests would only be approved where the collection of such information will provide the agency with information that would be collected and used in accordance with the Data Quality guidelines. RMA will be providing OMB with our detailed comments on this subject in response to the NHTSA’s request for comment published in the October 9<sup>th</sup> Federal Register. However, we would like to use this opportunity to point out that one of the requirements of the Paperwork Reduction Act is for NHTSA to establish a record demonstrating that, “to the maximum extent practical” the agency is using “information technology to reduce burden and improve data quality...” As RMA has previously discussed, use of XML as an

option to Excel would aid in both reducing burden and improving data quality. We do not see how NHTSA can adhere to the requirements of the Paperwork Reduction Act if the agency does not permit use of XML as an option for Early Warning Reporting.

### **Conclusion**

As we have demonstrated throughout this rulemaking, RMA is committed to assisting NHTSA in developing and implementing an effective early warning system for tires. Now that the final rules have been issued, we believe it is appropriate for NHTSA and the Volpe Center to work not only with RMA, but also with each tire manufacturer member of RMA to resolve all of the outstanding data transmission issues well before the first early warning reports are submitted next year. We would like to meet with you to discuss these issues.

Sincerely,

A handwritten signature in black ink that reads "Donald B. Shea". The signature is written in a cursive style with a large, stylized 'D' and 'S'.

Donald B. Shea  
President & CEO

Attachment

## REPORTING DATA SUBMISSION TEMPLATE

### Report Information

InfoName	InfoValue
ManufacturerName	
ReportQuarter	
ReportYear	
ReportName	Tires
ReportVersion	
ReportGeneratedDate	
ReportContactName	
ReportContactEmail	
ReportContactPhone	
NHTSATemplateRevisionNo	1.01

## Production

[illegible]

**SKU Type-Code**

[illegible]

### OE Vehicle

[illegible]



### Deaths/Injuries

[illegible]

### Deaths/Injuries Tires

[illegible]

## Property Damage

[illegible]

## Warranty Adjustments

[illegible]

## Common Green

[illegible]

## Report Information

InfoName	InfoValue	XML
ManufacturerName	TIRE COMPANY INC.	<?xml version="1.0"?>
ReportQuarter	1	<!DOCTYPE Tires SYSTEM "Tires.dtd">
ReportYear	2004	<Tires>
ReportName	Tires	<ReportInfo >
ReportVersion	1	<ManufacturerName>TIRE COMPANY INC.</ManufacturerName>
ReportGeneratedDate	4/1/2004	<ReportQuarter>1</ReportQuarter>
ReportContactName	IT CONTACT	<ReportYear>2004</ReportYear>
ReportContactEmail	<a href="mailto:itcontact@tirecompany.com">itcontact@tirecompany.com</a>	<ReportName>Tires</ReportName>
ReportContactPhone	(111) 222-3333	<ReportVersion>1</ReportVersion>
NHTSATemplateRevisionNo	1.01	<ReportGeneratedDate>4/1/2004</ReportGeneratedDate>
		<ReportContactName>IT CONTACT</ReportContactName>
		<ReportContactEmail>itcontact@tirecompany.com</ReportContactEmail>
		<ReportContactPhone>1112223333</ReportContactPhone>
		<NHTSATemplateRevisionNo>1.01</NHTSATemplateRevisionNo>
		</ReportInfo >

## Production

[illegible]

**SKU-Type Code**[illegible][illegible]



**OE Vehicle**

SKU	TypeCode
ABC123456	123W
ABC123456	123X
ABC123456	1234Z
BACD12345	1234Z
CB1234567	V9870

<b>XML</b>
<SKU-TypeCode>
<Tire>
<SKU>ABC123456</SKU>
<TypeCode>123W</TypeCode>
</Tire>
<Tire>
<SKU>ABC123456</SKU>
<TypeCode>123X</TypeCode>
</Tire>
<Tire>
<SKU>ABC123456</SKU>
<TypeCode>1234Z</TypeCode>
</Tire>
<Tire>
<SKU>BACD12345</SKU>
<TypeCode>1234Z</TypeCode>
</Tire>
<Tire>
<SKU>CB1234567</SKU>
<TypeCode>V9870</TypeCode>
</Tire>
</SKU-TypeCode>

## Deaths/Injuries

ID	IncidentDate	NumDeaths	NumInjuries	StateOrFCntry	VehicleMake	VehicleModel	VehicleModelYear
2004-1	2/5/2004	1	0	TEXAS	FORD	TAURUS	1998

### **XML**

```
<DeathsInjuries>
<DiTire>
<DiID>2004-1</DiID>
<IncidentDate>02/05/2004</IncidentDate>
<NumDeaths>1</NumDeaths>
<NumInjuries>0</NumInjuries>
<StateOrFCntry>TX</StateOrFCntry>
<VehicleMake>FORD</VehicleMake>
<VehicleModel>TAURUS</VehicleModel>
<VehicleModelYear>1998</VehicleModelYear>
</DiTire>
</DeathsInjuries>
```

## Deaths Injuries Tires

SKU	VehicleMake	VehicleModel	ProductionYear
ABC123456	GMC	JIMMY	2003
ABC123456	CHEVROLET	BLAZER	2003
CB1234567	FORD	TAURUS	2004

XML
<OE Vehicle>
<Fitment>
<SKU>ABC123456</SKU>
<VehicleMake>GMC</VehicleMake>
<VehicleModel>JIMMY</VehicleModel>
<ProductionYear>2003</ProductionYear>
</Fitment>
<Fitment>
<SKU>ABC123456</SKU>
<VehicleMake>CHEVEROLET</VehicleMake>
<VehicleModel>BLAZER</VehicleModel>
<ProductionYear>2003</ProductionYear>
</Fitment>
<Fitment>
<SKU>CB1234567</SKU>
<VehicleMake>FORD</VehicleMake>
<VehicleModel>TAURUS</VehicleModel>
<ProductionYear>2004</ProductionYear>
</Fitment>
</OE Vehicle>

## Property Damage

ID	IncidentDate	NumDeaths	NumInjuries	StateOrFCntry	VehicleMake	VehicleModel	VehicleModelYear
2004-1	2/5/2004	1	0	TEXAS	FORD	TAURUS	1998

### XML

```

<DeathsInjuries>
<DiTire>
<DiID>2004-1</DiID>
<IncidentDate>02/05/2004</IncidentDate>
<NumDeaths>1</NumDeaths>
<NumInjuries>0</NumInjuries>
<StateOrFCntry>TX</StateOrFCntry>
<VehicleMake>FORD</VehicleMake>
<VehicleModel>TAURUS</VehicleModel>
<VehicleModelYear>1998</VehicleModelYear>
</DiTire>
</DeathsInjuries>

```

## Warranty Adjustments

[illegible]

<b>XML</b>
<DeathsInjuries>
<DiTire>
<DiID>2004-1</DiID>
<TireLine>TIRE LINE 04</TireLine>
<TireSize>P205/75R15</TireSize>
<ProdYear>1999</ProdYear>
<TIN>PPSSTTTP0299</TIN>
<Tread-71>1</Tread-71>
<Sidewall-72>1</Sidewall-72>
<Bead-73>0</Bead-73>
<Other-98>0</Other-98>
<Unknown-99>0</Unknown-99>
</DiTire>
<DiID>2004-1</DiID>
<TireLine>TIRE LINE 04</TireLine>
<TireSize>P205/75R15</TireSize>
<ProdYear>1999</ProdYear>
<TIN>PPSSTTTP0299</TIN>
<Tread-71>0</Tread-71>
<Sidewall-72>1</Sidewall-72>
<Bead-73>0</Bead-73>
<Other-98>0</Other-98>
<Unknown-99>0</Unknown-99>
</DiTire>
<DiID>2004-1</DiID>
<TireLine>TIRE LINE 04</TireLine>
<TireSize>P205/75R15</TireSize>
<ProdYear>1998</ProdYear>
<TIN>PPSSTTTP1098</TIN>
<Tread-71>1</Tread-71>
<Sidewall-72>0</Sidewall-72>
<Bead-73>0</Bead-73>
<Other-98>0</Other-98>
<Unknown-99>0</Unknown-99>
</DiTire>
<DiID>2004-1</DiID>
<TireLine>TIRE LINE 04</TireLine>


<TireSize>P205/75R15</TireSize>
<ProdYear>1998</ProdYear>
<TIN>PPSSTTTP1098</TIN>
<Tread-71>0</Tread-71>
<Sidewall-72>0</Sidewall-72>
<Bead-73>0</Bead-73>
<Other-98>0</Other-98>
<Unknown-99>1</Unknown-99>
</DiTire>
</DeathsInjuries>

## Common Green

CGreenGroup	TireLine	TypeCode	SKU	XML
G-1	TIRE LINE 01	1234A	ABC123456	<CommonGreen>
G-1	TIRE LINE 02	1234B	FFE394941	<CgTire>
G-1	TIRE LINE 03	9876F	2278ASDF7	<CGreenGroup>G-1</CGreenGroup>
G-1	TIRE LINE 04	G6584	692048382	<TireLine>TIRE LINE 01</TireLine>
G-1	TIRE LINE 05	1234P	CB1234567	<TypeCode>1234A</TypeCode>
G-2	TIRE LINE 100	AA134	392104968	<SKU>ABC123456</SKU>
G-3	TIRE LINE 01	1234A	ABC123456	</CgTire>
				<CgTire>
				<CGreenGroup>G-1</CGreenGroup>
				<TireLine>TIRE LINE 02</TireLine>
				<TypeCode>1234B</TypeCode>
				<SKU>FFE394941</SKU>
				</CgTire>
				<CgTire>
				<CGreenGroup>G-1</CGreenGroup>
				<TireLine>TIRE LINE 03</TireLine>
				<TypeCode>9876F</TypeCode>
				<SKU>2278ASDF7</SKU>
				</CgTire>
				<CgTire>
				<CGreenGroup>G-1</CGreenGroup>
				<TireLine>TIRE LINE 04</TireLine>
				<TypeCode>G6584</TypeCode>
				<SKU>692048382</SKU>
				</CgTire>
				<CgTire>
				<CGreenGroup>G-1</CGreenGroup>
				<TireLine>TIRE LINE 05</TireLine>
				<TypeCode>1234P</TypeCode>
				<SKU>CB1234567</SKU>
				</CgTire>
				<CgTire>
				<CGreenGroup>G-2</CGreenGroup>
				<TireLine>TIRE LINE 100</TireLine>
				<TypeCode>AA134</TypeCode>
				<SKU>392104968</SKU>
				</CgTire>
				<CgTire>
				<CGreenGroup>G-3</CGreenGroup>
				<TireLine>TIRE LINE 01</TireLine>

					<TypeCode>1234A</TypeCode>
					<SKU>ABC123456</SKU>
					</CgTire>